

**Law Offices of Albert J. Rescinio, L.L.C.**

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**By: Albert J. Rescinio, Esq. (ID#034331989)**

**Attorneys for Plaintiff David M. Greco, *individually and on behalf of others similarly situated***

**UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF NEW JERSEY  
NEWARK VICINAGE**

**David M. Greco,  
*individually and on behalf of others  
similarly situated,***

***Plaintiff,***

**vs.**

**Gurbir S. Grewal,  
*New Jersey Attorney General, et al.,***

***Defendants.***

**Civil Action No. 3:19-cv-19145-BRM-TJB**

**Honorable Brian R. Martinotti, U.S.D.J.**

**Honorable Tonianne J. Bongiovanni, U.S.M.J.**

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**NOTICE OF MOTIONS**

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**TO: Honorable Brian R. Martinotti, U.S.D.J.**

**United States District Court**

**District of New Jersey**

**Newark Vicinage**

**United States Court House**

**Newark, New Jersey 07102**

**Robert McGuire, Deputy Attorney General**

**Simone Frey, Deputy Attorney General**

**Bryan Lucas, Deputy Attorney General**

**Office of the New Jersey Attorney General**

**R.J. Hughes Justice Complex**

**Trenton, New Jersey 08625**

**Attorneys for Defendant Gurbir S. Grewal  
Bryan Lucas, Deputy Attorney General  
Office of the New Jersey Attorney General  
R.J. Hughes Justice Complex  
Trenton, New Jersey 08625  
Attorney for Defendants Jared M. Maples and New Jersey Office of Homeland  
Security and Preparedness**

**Howard L. Goldberg, Esq.  
First Assistant County Counsel  
Office of the Camden County Counsel  
Courthouse - 14<sup>th</sup> Floor  
520 Market Street  
Camden, New Jersey 08102  
Attorney for Camden County Prosecutor's Office, Jill S. Mayer and Nevan Soumails**

**Vincent P. Sarubbim Esq.  
Daniel DeFiglio, Esq.  
Archer & Greiner, P.C.  
33 East Euclid Avenue  
Haddonfield, New Jersey 08033  
Attorneys for Defendants Gloucester Township Police Department, Bernard John  
Dougherty, Nicholas C. Aumendo, Donald B. Gansky, William Daniel Rapp and Brian  
Anthony Turchi**

**SIR/MADAM:**

**PLEASE TAKE NOTICE** that on a date and time to be fixed by the Court that the undersigned, attorney for Plaintiff David M. Greco, will move before the Court seeking an Order granting the following forms of relief:

- An Order certifying the matter as a “*Rule* 23(b)(3) Class Action” and specifically defining the “Certified Class”;
- An Order appointing Plaintiff David Greco as “Class Representatives”;
- An Order appointing Albert J. Rescinio, Esq. of Ocean Township (Monmouth County), New Jersey, as “Lead Class Counsel”;
- An Order approving the initial proposed “Class Notices”;
- An Order approving the initial proposed “Plan of Providing Notice”; and

- An Order commencing the providing of Notice of the pendency of this Class Action in the form and in the manner requested; and

**PLEASE TAKE FURTHER NOTICE** that at such time and place that the Plaintiff shall rely upon the MEMORANDUM OF LAW, the Declaration of David M. Greco and the Declaration of Albert J. Rescinio, Esq. with Exhibits, all submitted herewith; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested; and

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

s/ *Albert Rescinio*

**DATED: Jan. 10, 2020**

**ALBERT J. RESCINIO, ESQ.  
ATTORNEY FOR PLAINTIFF DAVID M. GRECO**

**PROOF OF SERVICE:**

**ALBERT J. RESCINIO, ESQ.** hereby certifies as follows:

1. I am the attorney for the Plaintiff in the within matter.
2. On today's date I caused copies of the moving papers to be filed electronically with the Clerk of the District Court and served on all parties electronically as per *Rules of Court*.

**I DECLARE UNDER THE PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.**

**EXECUTED THIS 10<sup>th</sup> DAY OF JANUARY 2020.**

s/ *Albert Rescinio*

**DATED: Jan. 10, 2020**

**ALBERT J. RESCINIO, ESQ.**